

### *Remarks*

Claims 1-20 are pending in this application with claims 1, 6, 12 and 18 being amended by this response to further clarify the claimed invention.

Support for the feature “automatically determined in response to predetermined instruction and independent of said end storage address” is found in para. 78, 79, 80 Figure 3 unit 3400 and example of para. 61 and other places. Specifically this limitation is supported in the description starting para. 0078 “The physical and/ or logical RBAs and ddnames are used to determine where within a set of, for example, 13 physical datasets any given record resides. This allows an application program to go directly to a record using the ddname and RBA of the record. An application program sequentially browsing through logical datasets 1300, 1600 is able to automatically determine a next dataset name to use once the end of the current physical dataset is reached. In certain operative embodiments, logical datasets 1300, 1600 comprise 26 files being divided into 2 logical sets—set ‘A’ and set ‘B’. Each file’s ddname is comprised of the same first 7 characters followed by a 1-character suffix...Using alphabetical characters in the ddname to delineate physical storage datasets in logical datasets increases effective storage capacities on logical and/or physical memory devices”. Further in para. 0035, “Relative Byte Address (RBA)” is indicated as comprising “an offset from the beginning of a memory or storage area (e.g. an offset within a VSAM dataset where a record begins)”.

### *Argument*

#### *1) Rejection of Claims 1-8, 12-14 and 18 under 35 U.S.C. § 103(a)*

Claims 1-8, 12-14 and 18 are rejected under 35 U.S.C. 103(a) as being unpatentable over L’Heureux (U.S. Patent Application No. 2003/0101193).

Amended claim 1 recites a method for processing application program data for storage and retrieval employed by a processing device. A logical dataset is designated and encompasses a plurality of physical storage datasets, each of the plurality of physical storage datasets having a predetermined storage capacity. An identifier identifying an end storage address of a first physical storage dataset of said logical dataset indicating end of said predetermined storage capacity of said first physical storage dataset is stored. Data is sequentially stored in the logical dataset and is monitored. The monitoring of the sequential storage of data in the logical dataset

determines an occurrence of data storage at a location identified by the end storage address of the first physical storage dataset. The method involves automatically continuing the sequential storage of data in a second physical storage dataset of the logical dataset starting at an address automatically determined in response to predetermined instruction and independent of the end storage address. L'Heureux, for the reasons presented below, neither discloses nor suggests each of the above claimed features.

L'Heureux describes a dataset monitoring system which merely analyzes the current dataset size and automatically generates a report which can be used by a user to take steps to eliminate or compress data from the dataset, thereby avoiding a "dataset is full" condition, which essentially halts the application (L'Heureux para 0029). The datasets being monitored are used by IBM's IMS product and are called OSAM datasets and are referred within that patent as "physical sequential data files" (L'Heureux para. 0032 line 1). In contrast the claimed arrangement does not merely monitor when a dataset is approaching capacity, it **automatically switches** writing data from one physical dataset onto another dataset when that first physical dataset is full, thus keeping the application available to the end-user. The logical dataset also incorporates a plurality of physical datasets which may be **non-contiguous**, e.g. on totally separate disk drives ("The physical and/ or logical RBAs and ddnames" (diskdrivenames) "are used to determine where within a set of, for example, 13 physical datasets any given record resides. This allows an application program to go directly to a record using the ddname and RBA of the record", para. 78). The system is compatible with VSAM ESDS datasets. In contrast the L'Heureux system is concerned with OSAM, and "physical sequential data files" (see para. 0027 L'Heureux) which can **only be processed sequentially**. In the claimed arrangement, in contrast, datasets can be processed either randomly (i.e., entered for access or storage at any point in response to user or device selection) or sequentially. L'Heureux states in para. 0001 "the present invention provides tools to look at physical sequential data files, such as the OSAM files used in IMS databases, to determine how much file space an IMS OSAM dataset has, for example". Also para 0004, 0005 "In light of the above, there was a critical need for tools to address the problems presented by the specific context of IMS OSAM datasets in particular and large hierarchical databases utilizing very large physical **sequential files** in general".

Consequently, L'Heureux nowhere shows or suggests "automatically continuing the sequential storage of data in a second physical storage dataset of the

logical dataset starting at an address automatically determined in response to predetermined instruction and independent of the end storage address". This is because L'Heureux is concerned with "physical sequential data files" (L'Heureux para. 0032 line 1).

Independent claims 8, 12 and 18 are considered to be patentable for reasons given in connection with claim 1 and additional features they include.

Dependent claims 2-7 and 13-14 are considered to be patentable based on their dependence on their respective base claims for reasons given in connection with claim 1 and because of the additional features they include

*II) Rejection of Claims 1-8, 12-14 and 18 under 35 U.S.C. § 103(a)*

Claims 9-11, 15-17 and 19-20 are rejected under 35 U.S.C. 103(a) as being unpatentable over L'Heureux (U.S. Patent Application No. 2003/0101193) in view of US Patent 4,408,273 - Plow.

Claim 9 recites "said end storage address of said first physical storage dataset of said logical dataset comprises a relative address". L'Heureux with Plow, for the reasons presented below, neither discloses nor suggests the feature combination of claim 9.

The system described by Plow relates to the IBM System Catalog which is a database of pointers to other datasets within a specific computer complex (Abstract and column 1 lines 8-11). Plow does not deal with application data, merely keeping track of where application datasets are stored within a specific computer complex. In contrast, the claimed arrangement is used for storing and processing application data. The references in combination fail to show or suggest "designating a logical dataset encompassing a plurality of physical storage datasets, each of said plurality of physical storage datasets having a predetermined storage capacity" and "automatically continuing said sequential storage of data in a second physical storage dataset of said logical dataset starting at an address automatically determined in response to predetermined instruction and independent of said end storage address". L'Heureux with Plow further nowhere suggests the features of the claim 9 arrangement in which "said end storage address of said first physical storage dataset of said logical dataset comprises a relative address".

Dependent claims 10-11, 15-17 and 19-20 are considered to be patentable based on their dependence on their respective base claims and because of the additional features they include for the reasons given in connection with claims 1 and 9.

Respectfully submitted,  
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